

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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ALVIN BALDUS, CARLENE BECHEN,  
ELVIRA BUMPUS, RONALD BIENDSEI,  
LESLIE W. DAVIS, III, BRETT ECKSTEIN,  
GEORGIA ROGERS, RICHARD  
KRESBACH, ROCHELLE MOORE, AMY  
RISSEEUW, JUDY ROBSON, JEANNE  
SANCHEZ-BELL, CECELIA SCHLIEPP,  
TRAVIS THYSSEN and CINDY BARBERA,

Case No. 11-C-562  
JPS-DPW-RMD

Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE  
MOORE, and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government  
Accountability Board, each only in his official  
capacity: MICHAEL BRENNAN,  
DAVID DEININGER, GERALD NICHOL,  
THOMAS CANE, THOMAS BARLAND,  
TIMOTHY VOCKE, and KEVIN KENNEDY,  
Director and General Counsel for the Wisconsin  
Government Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR.,  
THOMAS E. PETRI, PAUL D. RYAN, JR.,  
REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants

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VOCES DE LA FRONTERA, INC., RAMIRO  
VARA, OLGA VARA, JOSE PEREZ, and  
ERICA RAMIREZ,

Plaintiffs,

v.

Members of the Wisconsin Government  
Accountability Board, each only in his official  
capacity: MICHAEL BRENNAN, DAVID  
DEININGER, GERALD NICHOL, THOMAS  
CANE, THOMAS BARLAND, TIMOTHY  
VOCKE, and KEVIN KENNEDY, Director and  
General Counsel for the Wisconsin Government  
Accountability Board,

Case No. 11-CV-1011  
JPS-DPW-RMD

Defendants.

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**Declaration of Peter A. Morrison, Ph.D.**

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I, Peter A. Morrison, make this declaration under penalty of perjury under the laws of the United States:

1. I am an adult resident of the State of Massachusetts and was retained by the Wisconsin Government Accountability Board in this case. I provided deposition testimony at the instance of the Plaintiffs in January 2012 and at trial in February 2012.

2. The proposed map submitted by the plaintiffs to this Court on April 3, 2012, reflects a Latino citizen voting age population of 54.8% (assuming a non-citizenship rate of 42%) or 57.4% (assuming a non-citizenship rate of 35.75%). My calculations for the plaintiffs' map appear on the attached Exhibit 1.

3. Defendants' Map 1, submitted to this Court on April 3, 2012, reflects a Latino voting age population of 62.16%, which constitutes a Latino citizen voting age population of 48.8% (assuming a non-citizenship rate of 42%) or 51.4% (assuming a non-citizenship rate of 35.75%). My calculations for Map 1 appear on the attached Exhibit 2.

4. Defendants' Map 2, submitted to this Court on April 3, 2012, reflects a Latino voting age population of 64.9%, which constitutes a Latino citizen voting age

population of 51.8% (assuming a non-citizenship rate of 42%) or 54.3% (assuming a non-citizenship rate of 35.75%). My calculations for Map 2 appear on the attached Exhibit 2.

. Dated this 5<sup>th</sup> day of April, 2012.

A handwritten signature in black ink, appearing to read "Peter A. Morrison", written over a horizontal line.

Peter A. Morrison, Ph.D.

A - noncitizenship=		35.75% Total	Voting Age Pop. 18+	Hisp. Pop.	Hisp. VAP 18+	Hisp. Share of VAP	Non-Hisp. VAP	Hisp. CVAP	Hisp. Share of CVAP
District 8	Population	57,196	36,986	40,905	25,032	67.68%	11,954	16,083	57.4%
District 9	Population	57,283	39,653	31,492	18,843	47.52%	20,810	12,107	36.8%
B - noncitizenship=		42.00% Total	Voting Age Pop. 18+	Hisp. / Latino Pop.	Hisp. / Latino VAP 18+	Hisp. / Latino VAP as % of Total	Non-Latino VAP	Hisp. / Latino CVAP	Hisp. / Latino CVAP
District 8	Population	57,196	36,986	40,905	25,032	67.68%	11,954	14,519	54.8%
District 9	Population	57,283	39,653	31,492	18,843	47.52%	20,810	10,929	34.4%
Control Totals 8		-	-	-	-				
Control Totals 9		-	-	-	-				
Control Totals	114,479	76,639	72,397	43,875					
		These numbers are identical in summary stats.XLS							
		There are HCVPs on the map shown as 55.22% and 34.78% that do not match these values							



## 62% HVAP District (which is 51.4% HCVAP using Mayer's way of measuring)

A - Using noncitizenship = 35.75%

	Total Population	Voting Age Pop. 18+	Total Latino Pop.	Latino VAP 18+	Latino Share of VAP	Non-Latino VAP	Latino CVAP ("Eligibles")	Latino Share of CVAP
District 8	57,333	37,958	38,421	23,596	62.2%	14,362	15,160	51.4%
District 9	57,146	38,681	33,976	20,279	52.4%	18,402	13,029	41.5%
B - Using noncitizenship =	42.00%							

	Total Population	Voting Age Pop. 18+	Total Latino Pop.	Latino VAP 18+	Latino Share of VAP	Non-Latino VAP	Latino CVAP ("Eligibles")	Latino Share of CVAP
District 8	57,333	37,958	38,421	23,596	62.2%	14,362	13,686	48.8%
District 9	57,146	38,681	33,976	20,279	52.4%	18,402	11,762	39.0%

Control Totals 8  
Control Totals 9

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## 65% HVAP District (which is 54.3% HCVAP using Mayer's way of measuring)

A - Using noncitizenship = 35.75%

	Total Population	Voting Age Pop. 18+	Total Latino Pop.	Latino VAP 18+	Latino Share of VAP	Non-Latino VAP	Latino CVAP ("Eligibles")	Latino Share of CVAP
District 8	57,312	37,691	39,650	24,467	64.9%	13,224	15,720	54.3%
District 9	57,167	38,948	32,747	19,408	49.8%	19,540	12,470	39.0%

B - Using noncitizenship = 42.00%

	Total Population	Voting Age Pop. 18+	Total Latino Pop.	Latino VAP 18+	Latino Share of VAP	Non-Latino VAP	Latino CVAP ("Eligibles")	Latino Share of CVAP
District 8	57,312	37,691	39,650	24,467	64.9%	13,224	14,191	51.8%
District 9	57,167	38,948	32,747	19,408	49.8%	19,540	11,257	36.6%

Control Totals 8  
Control Totals 9

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efe54bff43e5e5b665b91b2d771e79d210131e1f6d3ae3dee7e2a89c8291]]

**Document description:**Exhibit 3

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3694a553edbc0b04cc5b2522b1004655ab4920caa0b4a7d1de2397627617]]

**Brandt, Karen J (15243)**

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**United States District Court**

**Eastern District of Wisconsin**

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**Case Number:** 2:11-cv-00562-JPS-DPW-RMD  
**Filer:**  
**WARNING: CASE CLOSED on 03/22/2012**  
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**DECLARATION of Peter A. Morrison, Ph.D. . (Attachments: # (1) Exhibit 1, # (2) Exhibit 2, # (3) Exhibit 3)(Kelly, Daniel)**

**2:11-cv-00562-JPS-DPW-RMD Notice has been electronically mailed to:**

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